

#### **Refrigerated Prepared Foods**

October 5, 2000

2001 Butterfield Road Downers Grove, IL 60515-1049 (630) 512-1190 (630) 512-1121 Fax

**Paul S. Halberstadt**Director,
Environmental Engineering

The Performance Track Information Center Industrial Economics, Inc. 2067 Massachusetts Avenue Cambridge, MA 02140

Attention: Julie Spyres

Subject: ConAgra Application

**EPA Performance Track** 

Dear Julie Spyres:

Enclosed is an additional application for multiple facilities within ConAgra for the EPA Performance Track. The facility is the following:

• ConAgra Frozen Foods, Russellville, AR

On behalf of the Sustainable Development Council of ConAgra we look forward to participating in this process to demonstrate that environmental and business needs can be successfully combined. If you have any questions, please call me at 630-512-1190.

Sincerely yours,

Paul S. Halberstadt

Director, Environmental Engineering

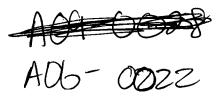
and d. Halbertalt (now)

PSH:mam

Attachments (1)

Cc: without attachments

Phil James Don Radentz Alan Meyer





# National Environmental Achievement Track

#### **Application Form**

ConAgra Frozen Foods
Name of facility
ConAgra, Inc.
Name of parent company (if any)
3100 E. Main Street
Street address
Street address (continued)
Russellville, AR. 72801
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Craig J. Tobin

Title Safety and Compliance Manager

Phone (501) 964-8205

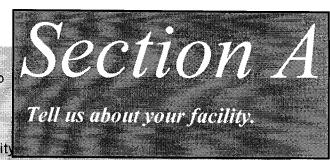
Fax (501) 964-8287

E-mail ctob01@conagrafrozen.com

EPA needs background information on your facility to evaluate your application.

#### What do you need to do?

- Provide background information on your facility
- Identify your environmental requirements.



1 What do you do or make at your facility? Frozen Meals, Frozen Entrees 2 List the Standard Industrial Classification (SIC) SIC 2038 code(s) or North American Industrial Classification System (NAICS) codes that you **NAICS** use to classify business at your facility. ☐ No 3 Does your company meet the Small Business Administration definition of a small business for your sector? 4 How many employees (full-time equivalents) Fewer than 50 currently work at your facility? 50-99 100-499 500-1,000 More than 1,000

5	Does your facility have an EPA ID number(s)?  If yes, list in the right-hand column.	∑ Yes ARD983270802	□ No 2
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right <b>or</b> enclose a completed Checklist with your application.	See Checklist	
7	Check the appropriate box in the right-hand column.		ne requirements above. ed the Checklist with my
8	Optional: Is there anything else you would like to tell us about your facility?		

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

### What do you need to do?

 Confirm that your EMS meets the Achievement Track requirements.

 Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B. Tell us about your EMS.

1 Check yes if your EMS meets the requirements for each element below as defined in the instructions.	
a. Environmental policy	∑Yes
<u>.</u>	∑ Yes
b. Planning	∑ Yes
C. Implementation and operation	Yes
d. Checking and corrective action	⊠ Yes
e. Management review	_
2 Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Yes
3 Did this cycle include both an EMS and a compliance audit?	<b>∑</b> Yes
4 Have you completed an objective self-assessment or third-party assessment of your EMS?	⊠ Yes
If yes, what method of EMS assessment did you use?	Self-assessment
if yes, what method of a to a series	☐ GEMI
	☐ CEMP
	☐ Third-party assessment
	ISO 14001 Certification
	Other
	,

Facilities must show that they are committed to improving their environmental performance. This med that you can describe past achievements and will modute commitments.

#### What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the pro (2 years ago)?	evious level	What is the curre	nt level?
Water usage reduction	Quantity 242,528,000	Units gallons	Quantity 219,376000	Units gallons

- i. How is the current level an improvement over the previous level?
  - Approximately 10% usage reduction
- ii. How did you achieve this improvement?

This was accomplished primarily by recycling water through our ammonia evaporator system.

Second aspect you've selected

What aspect have you selected?	What was the pre (2 years ago)?	evious level	What is the curre	nt level?
Natural gas usage reduction	Quantity .012	Units MMBTU	Quantity .010	Units MMBTU
<ul><li>i. How is the current level of previous level?</li></ul>	an improvement o	ver the	,	
Approximately a 16.7% re	eduction			
ii. How did you achieve thi	is improvement?			
Removal of our old heat	ing system and the	e installation of c	n more efficient one	

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

#### First aspect you've selected

a. What is the aspect?	Water use reduction	
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	⊠ Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☐ Option A: Absolute value  ☐ Option B: In terms of units of production or output	(Quantity/Units) 8gal/case (Quantity/Units)

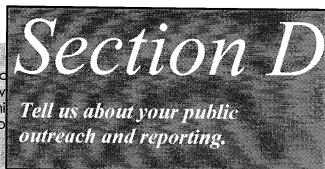
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value  Option B: In terms of units of production or output	(Quantity/Units) 7.52 gal/case (Quantity/Units)
e. How will you achieve this improvement?	Installation of a CIP sanitation s water through re-design of our Other conservation efforts.	ystem. Reclaim heat exchangers.
Second aspect you've selected		
a. What is the aspect?	Anhydrous ammonia use reduc	tion
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	☐ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☐ Option A: Absolute value  ☐ Option B: In terms of units of production or output	(Quantity/Units) .00142 lbs/case (Quantity/Units)
<ul> <li>d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.</li> <li>e. How will you achieve this improvement?</li> </ul>	units of production or output  Re-piping the refrigeration proc	(Quantity/Units) .00133 lbs/case (Quantity/Units) ess. Streamline
	and up-date equipment.	

Third aspect you've selected		_
a. What is the aspect?	Carbon dioxide use reduction	
b. Is this aspect identified as significant in your EMS?	Yes □ No	
<ul> <li>c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.</li> <li>d. What is the improvement you are committing to over the next three years? You may choose to</li> </ul>	Option A: Absolute value  (Quantity/Units)  Option B: In terms of Units of production or output  Option A: Absolute value	
state this as an absolute value or in terms of units of production or output.	(Quantity/Units)   Option B:  In terms of	
e. How will you achieve this improvement?	Eliminating the use of CO2.	
Fourth aspect you've selected		_
a. What is the aspect?	Reduction in average packaging weight for Banquet/Healthy Choice dinner cases. (15.3% Banquet, 7.5% Healthy Choice)	
<ul><li>b. Is this aspect identified as significant in your EMS?</li></ul>	Yes □ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of	Option A: Absolute value (Quantity/Units)	
production or output.	<ul> <li>✓ Option B:</li> <li>In terms of</li> <li>units of production</li> <li>or output</li> <li>Choice case</li> <li>(Quantity/Units)</li> </ul>	
d. What is the improvement you are committing to over the next three years? You may choose to state	Option A: Absolute value (Quantity/Units)	
this as an absolute value or in terms of units of production or output.	<ul> <li>✓ Option B:</li> <li>In terms of units of production or output</li> <li>1.975 lbs/avg. Banquet</li> <li>Healthy Choice case (Quantity/Units)</li> </ul>	-

e. How will you achieve this improvement?

Packaging modification will reduce packaging weight by 15.3% on Banquet Dinners and by 7.5% on Healthy Choice Dinners.

Facilities must demonstrate their commitment to public outreach and performance reporting. You should hav appropriate mechanisms in place to identify communications, to communicate with the public, and to proinformation on your environmental performance.



#### What do you need to do?

- Describe your approach to public outreach.
- · List three references who are familiar with your facility.
- 1 How do you identify and respond to community concerns?

Risk Management Planning (RMP) meeting

- 2 How do you inform community members of important matters that affect them?
- 1. Local newspaper
- 2. Public meetings
- 3. ConAgra Web-site
- 3 How will you make the Achievement Track Annual Performance Report available to the public?
- ☑ Website www.
- **Newspaper**
- Open Houses
- Other

Annual Sustainable Development conference

4	Are there any ongoing citizen suits against your facility?	☐ Yes	⊠ No
	If yes, describe briefly in the right-hand column.		

#### 5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Office of Emergency Services	Hanson Hammrick	(501) 968-1800
State/Local Regulator	Arkansas Department of Emergency Management	W.R. Harper	(501) 730-9750
Other community/local reference	Russellville Fire Department	Mark Vaughn	(501) 964-968-2332



# On behalf of ConAgra Frozen Foods [my facility],

#### I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Program Description and in the Application Instructions;
- I have personally examined and am familiar with the information contained in this Application (including, if
  attached, the Environmental Requirements Checklist). The information contained in this Application is, to the
  best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to
  believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS
  requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local
  environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the
  facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my
  facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable
  federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

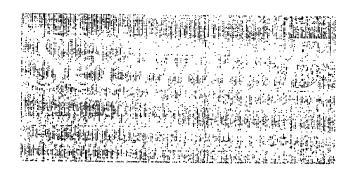
Printed Name/Title Michael F. Tracy, Plant Manager

Facility Name ConAgra Frozen Foods

Facility Street Address 3 | 00 E. Main Street, Russellville, Arkansas 7280 |

Facility ID Numbers ARD983270802

10/27/00 Cm



# On behalf of ConAgra Frozen Foods [my facility],

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I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Mil/7 Tran / 9/22/00

Signature/Date

Printed Name/Title Michael F. Tracy, Plant Manager

Facility Name ConAgra Frozen Foods

Facility Street Address 3100 E. Main Street, Russellville, Arkansas 72801

Facility ID Numbers ARD983270802

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

# National Environmental Achievement Track

## Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

3100 E. Main Street, Russellville, Arkansas 72801

ConAgra Frozen Foods

ARD983270802

(attach additional sheets if necessary)	
Air Pollution Regulations  1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)  2. Permits and Registration of Air Pollution Sources  3. General Emission Standards, Prohibitions and Restrictions	Check All That Apply
<ol> <li>Control of Incinerators</li> <li>Process Industry Emission Standards</li> <li>Control of Fuel Burning Equipment</li> <li>Control of VOCs</li> <li>Sampling, Testing and Reporting</li> <li>Visible Emissions Standards</li> <li>Control of Fugitive Dust</li> <li>Toxic Air Pollutants Control</li> <li>Vehicle Emissions Inspections and Testing</li> </ol>	
Other Federal, State, Tribal or Local Air Pollution Regulations Not List (identify)  13. 14.	ed Above
Hazardous Waste Management Regulations  1. Identification and Listing of Hazardous Waste (40 CFR 261)  - Characteristic Waste  - Listed Waste  2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)  - Manifesting	

**Facility Name** 

Facility Location:

Facility ID Number(s):

	- Pre-transport requirements	$\boxtimes$
3.	- Record keeping/reporting Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	EZI
٥.	- Transfer facility requirements	
	- Manifest system and record-keeping	Ħ
	- Hazardous waste discharges	H
4.		سي
٦.	- General facility standards	
	- Preparedness and prevention	
	- Contingency plan and emergency procedures	
	- Manifest system, Record keeping and reporting	$\sqcap$
	- Groundwater protection	Ħ
	- Financial requirements	Ħ
	- Use and management of containers	
	- Tanks	Ħ
	- Waste piles	Ħ
	- Land treatment	Ħ
	- Incinerators	
5	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	Ħ
6.	Interim Standards for Owners and Operators of New Hazardous Waste Land	Ħ
Ų.	Disposal Facilities (40 CFR 267)	
7.	Administered Permit Program (Part B) (40 CFR 270)	
/ -	Aminimistra I office I office I office of the state of th	_
	Other Federal, State, Tribal or Local Hazardous Waste Management Reg	ulations Not
	Other Federal, State, Tribal or Local Hazardous Waste Management Reg Listed Above (identify)	nlations Not
8.		nlations Not
8. 9.		ulations Not
9.	Listed Above (identify)	nlations Not
9. <u>Haz</u>	Listed Above (identify)  ardous Materials Management	ulations Not
9. <u>Haz</u> 1.	Listed Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	ulations Not
9. <u>Haz</u>	Listed Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous	ulations Not
9. <u>Haz</u> 1. 2.	Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous  Materials Spill (40 CFR 302)	
9. <b>Haz</b> 1. 2.	Active Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous  Materials Spill (40 CFR 302)  Hazardous Materials Transportation Regulations (49 CFR 172-173)	ulations Not
9. <b>Haz</b> 1. 2. 3. 4.	Activity Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous  Materials Spill (40 CFR 302)  Hazardous Materials Transportation Regulations (49 CFR 172-173)  Worker Right-to-Know Regulations (29 CFR 1910.1200)	
9. <b>Haz</b> 1. 2.	Active Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous  Materials Spill (40 CFR 302)  Hazardous Materials Transportation Regulations (49 CFR 172-173)	
9. <b>Haz</b> 1. 2. 3. 4.	Active Above (identify)  ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) Hazardous Materials Transportation Regulations (49 CFR 172-173) Worker Right-to-Know Regulations (29 CFR 1910.1200) Community Right-to-Know Regulations (40 CFR 350-372)	
9. <b>Haz</b> 1. 2. 3. 4.	Active Above (identify)  ardous Materials Management  Control of Pollution by Oil and Hazardous Substances (33 CFR 153)  Designation of Reportable Quantities and Notification of Hazardous  Materials Spill (40 CFR 302)  Hazardous Materials Transportation Regulations (49 CFR 172-173)  Worker Right-to-Know Regulations (29 CFR 1910.1200)  Community Right-to-Know Regulations (40 CFR 350-372)  Other Federal, State, Tribal or Local Hazardous Materials Management 1	
9. Haz 1. 2. 3. 4. 5.	Active Above (identify)  ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) Hazardous Materials Transportation Regulations (49 CFR 172-173) Worker Right-to-Know Regulations (29 CFR 1910.1200) Community Right-to-Know Regulations (40 CFR 350-372)	
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4. 5.	Solid Waste Storage and Removal Requirements Disposal Requirements for Special Wastes	
	Other Federal, State, Tribal or Local Solid Waste Management Regulation	s Not
	Listed Above (identify)	
6.		
7.		
Wat	er Pollution Control Requirements	<b>⊳</b> 7
1.	Oil Snill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	
2.	Design of Hoggredous Substances (40 CFK 110)	
3.	Designation of Mazardous Substances (40 CFR Determination of Reportable Quantities for Hazardous Substances (40 CFR	
	117)	$\boxtimes$
4.	NPDES Permit Requirements (40 CFR 122)	Ħ
_	music Deliveret Efficient Standards (40) CFK 129)	☒
6.	General Pretreatment Regulations for Existing and New Sources (40 CFR	<del></del>
	403)	
7.		_
	Standards (40 CFR 414) Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and	
8.	Inorganic Chemicals Manufacturing Four Source Edition	
^	Standards (40 CFR 415) Plastics and Synthetics Point Source Effluent Guidelines and Standards (40	
9.	CFR 416)	
10	Water Quality Standards	
11.	C. Thencet Decomptons	$\Box$
12	namit Manitoring/Reporting Requirements	
13	- + C - 'C - Alessa at Chaprotore 200 300 500 500 500 500	
13	Industrial Wastewater Plants	abla
14	Collection, Handling, Processing of Sewage Sludge	
15	Oil Discharge Containment Control and Cleanup	
16		
•		ne Not I isted
	Other Federal, State, Tribal or Local Water Pollution Control Regulation	ns Mat Distor
	Above (identify)	П
17	7.	Ħ
18	3.	
	A NEW A Demulations	
<u>D</u> :	rinking Water Regulations 1. Underground Injection and Control Regulations, Crieria and Standards (40)	
	1. Underground Injection and Control 108	K-7
	CFR 144, 146)  2. National Primary Drinking Water Standards (40 CFR 141)	$\boxtimes$
	2. National Primary Drinking Water Standards (10 02 20 17) 3. Community Water Systems, Monitoring and Reporting Requirements (40	
	OED 141)	<b>—1</b>
	4. Permit Requirements for Appropriation/Use of Water from Surface or	
	Subsurface Sources	
	5. Underground Injection Control Requirements	L. J

6.	Monitoring, Reporting and Record keeping Requirements for Community Water Systems				
	Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)				
7.	Above (Identity)				
8.					
Tox	Toxic Substances				
1.	Manufacture and Import of Chemicals, Record keeping and Reporting	$\boxtimes$			
	Requirements (40 CFR 704)				
2.	Import and Export of Chemicals (40 CFR 707) Chemical Substances Inventory Reporting Requirements (40 CFR 710)	H			
3. 4.		H			
5.	Health and Safety Data Reporting (40 CFR 716)				
6.	Pre-Manufacture Notifications (40 CFR 720)				
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)				
8.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)				
9.	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)				
	Other Federal, State, Tribal or Local Toxic Substances Regulations Not Liste	d Above			
10	(identify)				
10. 11.		Ħ			
1.4-		_			
Pes	ticide Regulations	-			
	FIFRA Pesticide Use Classification (40 CFR 162)	X			
2.	Procedures for Disposal and Storage of Pesticides and Containers (40 CFR				
	165)				
3.		H			
4.		H			
5. 6.					
7.					
8.	*				
	Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Abov	'e			
_	(identify)				
9.					
10					
Environmental Clean-Up, Restoration, Corrective Action					
1	A A A A A A A A A A A A A A A A A A A				
-	(Superfund) (identify)				

2.	RCRA Corrective Action (identify)	
3. 4.	Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)	